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PRELIMINARY ASSESSMENT
REASSESSMENT
FOR
CERCLIS SITE NAME ESSEX GROUP INC. - TRIANGLE PLASTICS
CITY, STATE
U.S. EPA ID MIDO 42433458
SS ID NO.
TDD NO. F05-05871106L
PAN FM10243SA

MARCH 1, 1988

Prepared for:
U.S. ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS SITE EVALUATION DIVISION

under Contract Number 68-01-7347

Preliminary Assessment
Reassessement

PRELIMINARY ASSESSMENT REASSESSMENT

THIS DOCUMENT IS CONFIDENTIAL. Due to the predecisional nature of this document, this document and attachments are not to be released without prior approval of the United States Environmental Protection Agency (U.S. EPA).

This Preliminary Assessment (PA) Reassessment has been prepared by Ecology and Environment, Inc., or its subcontractor C.C. Johnson and Malhotra, P.C., under the Field Investigation Team (FIT) contract with the U.S. EPA (No. 68-01-7347). The purpose of this PA Reassessment is to supplement the completed PA Form 2070-12 with preliminary and projected Hazard Ranking System (HRS) scores using HRS 1 (40 CFR 300, July 16, 1982) criteria and provide factor values using the revised HRS 2 (Federal Register proposed date, April 1988) criteria.

The preliminary HRS 1 score has been computed using available file information. The projected HRS 1 scores have been computed assuming requisite data which will be collected during potential site inspection activities. The HRS 2 factor values have been computed using available file information. The HRS 2 factor value criteria were developed to reflect anticipated key HRS 2 scoring issues.

Using this information, the U.S. EPA will be able to prioritize site inspection activities. This PA Reassessment is not a work plan to perform site inspection activities and no field activities were performed by the FIT prior to preparing this document.

A. GENERAL INFORMATION

CERCLIS Site Name: Essex Group Inc. - TRIANGLE PLASTICS
Also Known As: Recently Known as Regal Plastics
Formerly Known As:
Address: 15700 COMMON RD, ROSEVILLE, MI 48066
City: DETROIT
County: MACOMB
State: MI
Zip Code: 48066
U.S.EPA ID No: MI DO 424 33458
SS ID No.:
TDD No.: F05 - 0587 11 064
PAN: FMI 0243 SA

PA Completed By: T. PACHOWICZ - E+E (AGENCY) DATE: 5-25-83
PA Reassessment Prepared By: M. PECENY E+E (FIT) DATE: 5-10-88
PA Reassessment Reviewed By: (FIT) DATE:
PA Reassessment Approved By: (FIT) DATE:

U.S. EPA USE ONLY:

PA Reassessment Reviewed by (US EPA) DATE:

[ ] APPROVED; Recommend Screening Site Inspection.

[ ] APPROVED; No Further Remedial Action Planned.

[ ] REJECTED.

COMMENTS:

B. SITE INFORMATION

SITE DESCRIPTION (type of operation, physical description, i.e., landfill):
Site is located in an industrial complex along the Crosbeck Hwy within the Sec 7, T.1N., R. 13E in relatively flat terrain, surrounding by residential development within a distance of about 5000 - 1000 feet. (Ref. 6)
The TR. Plastics manufactured (1967-1980) the plastic goods in plant and used ground water from well to cool down the metal molds (indirect contact). The cooling water was disposed into sanitary sewer at the site. Owner of the TR. Pl. was Essex Group Inc. Plant was bought out by Regal Plastic in 1980 - 1981 and operates recently.

SITE HISTORY (current or previous owner/operator; history of operations; active/inactive/unknown; previous agency actions): TR. PLASTIC OPERATION ~~CEASED~~ in 1980 (Ref. 7 10). PA was conducted in 1983 (Ref. 1), Notification of Haz. Waste Site Under P.L. Section 103 was filed in 6/9-80 (Ref. 2), waste water information was filed in 1973 (Ref. 3) NPDES permit inspection by State was conducted in 1975 (Ref. 4 and 5) No need for NPDES permit or presence of haz. waste was encountered.
Site and plant is owned by Regal Plastics and produces the same type of products (plastics for auto industry) as previous TRIANGLE.

DESCRIPTION OF POTENTIAL HAZARD (substances present or alleged; migration pathways; targets):
It appears that TRIANGLE PLASTIC did not release any haz. substance into environment (with respect both observed or potential release). No data exists from cooling water discharges analyses. (1967 - 1980). Cooling water was not in direct contact with plastic material and was used exclusively for cooling of injection metal molds. Therefore, the potential of cooling water contamination is judged to be very low to nill.
Recently, Regal Plastics doesn't generate (Ref. 11) any haz. waste and doesn't have any discharge or disposal permitted by State cooling water quality is sampled (in house) - Ref. 11

Data reviewed indicates no observed or potential contamination of environment by hazard. substances. [redacted]

Figure(s) located on following page(s).

[redacted] Not responsive

C. HRS 1- PRELIMINARY AND PROJECTED HRS SCORES

The preliminary and projected HRS 1 scores were computed using HRS 1 (40 CFR 300, July 16, 1982) criteria. HRS 1 score worksheets are located in Section 2.

PRELIMINARY HRS SCORE
(This score is based on existing file information that was obtained prior to the screening site inspection.)

S_M=_____ S_{FE}=_____ S_{DC}=_____

PROJECTED HRS SCORE FOR SCREENING SITE INSPECTION (SSI)
(This score is based on the expected acquisition of information from the screening site inspection.)

S_M=_____ S_{FE}=_____ S_{DC}=_____

PROJECTED HRS SCORE FOR LISTING SITE INSPECTION (LSI)
(This score is based on the expected acquisiton of information from the listing site inspection.)

S_M=_____ S_{FE}=_____ S_{DC}=_____

D. HRS 2- FACTOR VALUE

The HRS 2 factor values were computed using the revised HRS 2 (Federal Register proposed date, April 1988) criteria. The HRS 2 factor values have been calculated using available file information. HRS 2 factor value worksheets are located in Section 3.

Factor	Factor Value		Observed Human Exposure (X)
Waste Characteristics	_____	(100)	
Air Pathway	_____	(100)	
Groundwater Pathway	_____	(100)	_____
Surface Water Pathway	_____	(100)	_____
On-site Pathway	_____	(100)	_____
TOTAL HRS 2 FACTOR VALUE	_____	**(500)**	

Hazard Ranking System 1
Score Worksheets

Hazard Ranking System 2
Factor Value Worksheets

HRS 2- FACTOR VALUE

Factor	Factor Value		Observed Human Exposure (X)
Waste Characteristics	_____	(100)	
Air Pathway	_____	(100)	
Groundwater Pathway	_____	(100)	_____
Surface Water Pathway	_____	(100)	_____
On-site Pathway	_____	(100)	_____
TOTAL HRS 2 FACTOR VALUE	_____	(500)	

WASTE CHARACTERISTICS

	Yes (x)	Reference	Factor Value
1. (a) Are CONTAINERS open, unsealed, or non-intact?	___	_____	_____(5)
(b) Is there evidence of contaminant migration away from the containers?	___	_____	_____(5)
(c) Is the source(s) unlined or does it have unsound diking?	___	_____	_____(5)
2. (a) Does the LANDFILL have exposed waste, or is the landfill uncovered, or is the landfill covered with contaminated soil, non-intact cover or cover less than 1 inch?	___	_____	_____(5)
(b) Is there evidence of contaminant migration away from the source?	___	_____	_____(5)
(c) Is there an absence of a liner, a run-on or runoff management system or leachate collection and removal system?	___	_____	_____(5)
3. (a) Is the SURFACE IMPOUNDMENT wet and non-enclosed?	___	_____	_____(5)
(b) Is there evidence of contaminant migration away from the source?	___	_____	_____(5)
(c) Is there no liner or diking?	___	_____	_____(5)
4. (a) Is the PILE uncovered, or is the pile covered with contaminated soil, non-intact cover or cover less than 1 inch?	___	_____	_____(5)
(b) Is there an absence of a functioning run-on or runoff management system or leachate collection system?	___	_____	_____(5)
(c) Is there an absence of a liner?	___	_____	_____(5)
5. Only answer highest factor value for the following questions:			
(a) Is constituent data available for waste?	___	_____	_____(10)
(b) Is waste quantity as deposited information available?	___	_____	_____(8)
(c) Is disposal volume known?	___	_____	_____(4)
(d) Is disposal area known?	___	_____	_____(2)

...Continued

WASTE CHARACTERISTICS (Continued)

6. Complete the table for all sources at the site. Calculate Waste Quantity score and record summation to a maximum value of 30.

Source	Surface Area (ft2)	+	Divisor	=	Waste Quantity Score
Pile		+	85	=	
Drums/Non-drum Container		+	233	=	
Surface Impoundment		+	375	=	
Land Treatment		-	27,000	=	
Landfill		+	85,666	=	
Contaminated Soil		+	1,125,000	=	

Total _____ _____(30max)

Total Waste Characteristics _____ (100)

AIR PATHWAY

	Yes (x)	Reference	Factor Value
1. Only assign factor value for (a) or (b), choosing the higher value:			
(a) Is there a residence or regularly occupied building between 0 to 1/8 mile from a potential source(s)?	___	_____	_____(25)
(b) Is there a residence or regularly occupied building between 1/8 to 2 miles from a potential source(s)?	___	_____	_____(5)
2. Complete (a) and (b) and assign the higher factor value:			
(a) If documented contamination of air, answer yes and assign factor value of 75.	___	_____	_____(75)
(b) Calculate potential population and assign factor value as given below:	___	_____	

Distance (mile)	Population	x	Distance Weighting Factor	=	Subtotal
Onsite		x	1.682	=	
0-1/4		x	0.323	=	
1/4-1/2		x	0.056	=	
1/2-1		x	0.017	=	
1-2		x	0.005	=	
2-3		x	0.003	=	
3-4		x	0.002	=	

Total _____ x $\frac{1}{100}$ = _____(75max)

Total Air Pathway Value _____ (100)

GROUNDWATER PATHWAY

	Yes (x)	Reference	Factor Value
1. Is the depth to the aquifer of concern less than 800 feet?	____	_____	_____(5)
2. (a) Within 2 miles of the site, is the geologic material between the waste and the aquifer of concern composed predominantly of sands, gravels, sandstone, limestone or dolomite?	____	_____	_____(5)
(b) Within 2 miles of the site, is there evidence of a low hydraulic conductivity layer (10^{-6} to 10^{-9})between the waste and the aquifer of concern?	____	_____	_____(-15)
3. Only assign factor value for (a) or (b), choosing the higher value: (a) is there a drinking water well(s) in the aquifer of concern or a more shallow unit 0 to 1/2 mile from the source(s)?	____	_____	_____(20)
(b) Is there a drinking water well(s) in the aquifer of concern or a more shallow unit 1/2 to 2 miles from the source(s)?	____	_____	_____(5)
4. Is the aquifer of concern a karst unit?	____	_____	_____(10)
5. Is the aquifer of concern a sole source aquifer?	____	_____	_____(5)
6. Complete (a) and (b), and assign the higher factor value: (a) If documented contamination of drinking water wells with TCL/TAL compounds, answer yes and assign a factor value of 50.	____	_____	_____(50)
(b) Calculate potential population and assign factor value as given below:	____	_____	

Distance (mile)	Population	x	Distance Weighting Factor	=	Subtotal
0-1/4		x	0.25	=	
1/4-1/2		x	0.16	=	
1/2-1		x	0.08	=	
1-2		x	0.05	=	
2-3		x	0.03	=	
3-4		x	0.02	=	

Total _____ x 1/100 = _____(50max)

TOTAL GROUNDWATER PATHWAY VALUE _____ **(100)**

SURFACE WATER PATHWAY

	Yes (x)	Reference	Factor Value
1. Does site lie within a 100-year or less floodplain?	___	_____	_____(5)
2. Is there contamination attributable to the site at a drinking water intake?	___	_____	_____(20)
3. Is this a sole-source surface water supply?	___	_____	_____(10)
4. Is a fishery (production) contaminated as a result of the site, or is a fishery potentially impacted within 15 miles as a result of the site?	___	_____	_____(5)
5. Is a recreation area contaminated as a result of the site, or is a recreation area potentially impacted within 15 miles as a result of the site?	___	_____	_____(5)
6. Is a sensitive environment contaminated as a result of the site, or is a sensitive environment potentially impacted within 15 miles as a result of the site?	___	_____	_____(5)
7. Complete (a) and (b), and assign the higher factor value:			
(a) If there is documented contamination of a surface water intake with TCL/TAL compounds within 15 miles as a result of the site, answer yes and assign a factor value of 50.	___	_____	____(50)
(b) Calculate potential population and assign a factor value as given below:	___	_____	

Intake	Population	x	* Dilution Weighting Factor	=	Subtotal
#1		x		=	
#2		x		=	
#3		x		=	
		x		=	
		x		=	
		x		=	

* Use table on following page.

Total_____ x 1/100 =_____(50max)

TOTAL SURFACE WATER PATHWAY VALUE _____(100)

SURFACE WATER PATHWAY

TABLE
DILUTION WEIGHTING FACTORS

Surface Characteristic	Average Annual Flow in Cubic Feet per Second (CFS)	Assigned Value
Minimum perennial stream	Less than 5 cfs	2.5
Small to moderate stream	5 to 50 cfs	0.25
Moderate to large stream	Greater than 50 to 500 cfs	0.025
Large streams to rivers	Greater than 500 to 10,000 cfs	0.0013
Major rivers	Greater than 10,000 cfs	0.0003
Ocean or the Great Lakes	Not applicable	0.0003
Mixing zone of quiet flowing rivers	Greater than 50 cfs	0.125
Lakes, reservoirs	Add and average CFS of tributaries flowing into lake/reservoir.	Assign value to calculated CFS figure using above factors.

ON-SITE PATHWAY

	Yes (x)	Reference	Factor Value
1. Is the site located in an area where people live or go to school within 1 mile of the source(s)? *If answer NO to Question 1, do not proceed with the remaining questions.	___	_____	___(10)
2. Is there known contamination from the site on residential or school property?	___	_____	___(15)
3. Is site public use land or widely used land without barriers?	___	_____	___(10)
4. Complete (a), (b) and (c), and assign the highest factor value: Which of the following are adjacent to site/source(s) or contaminated from the site?			
(a) Schools, day-care	___	_____	___(15)
(b) Parks, playgrounds, residences	___	_____	___(10)
(c) National park, federal endangered species, other public-use lands.	___	_____	___(5)

5. Calculate population within 1 mile of the site, and assign factor value as given below:

Distance (mile)	Population	x	Distance Weighting Factor	=	Subtotal
0-1/4		x	0.05	=	
1/4-1/2		x	0.025	=	
1/2-1		x	0.0125	=	

Total _____ _____(50max)

TOTAL ON-SITE PATHWAY VALUE _____(100)

References

REFERENCE DOCUMENTATION SHEET

Ref.#	DESCRIPTION OF REFERENCE
1	Prelim. Assessment, Michigan TDD R5-8212-03A-243 Essex Group Inc, Roseville, MIDO 042433458
2	EPA-NOTIS DATA MNG. SYSTEMS - HAZ. WASTE NOTIFICATION 9-25-81
3	WASTEWATER DISCHARGE NOTIFICATION, STATE OF MI DEPT. OF NAT. RESOURCES, 1-1-1973
4	MI State, DNR, Bureau of Water Mng. - NPDES permit requirement for Triangle Plastic Div. - Essex group (surface water discharge), 8-15-1974

TDD FOS-08811064
TRIANGLE PLASTICS

REFERENCE DOCUMENTATION SHEET

Ref.#	DESCRIPTION OF REFERENCE
5	MI State, DNR, BW Mng. Site visit report on Triangle Plastics Site (for NPDES application) 4-10-1975
6	USGS Topo Map 7.5 min, Roseville
7	Telecomm. Record, Subj: Essex Group – info
	Telecomm. Record.
8	MI-State Environmental Health Dept. Subj: File info for Triangle Plastics

TDD FOR – 05871064
TRIANGLE PLASTICS

REFERENCE DOCUMENTATION SHEET

Ref.#	DESCRIPTION OF REFERENCE
9	Telecomm. Record, City of Roseville. Subj.: City file search on Triangle Plastics Div.
10	Telecomm. Record, United Technology, Automotive Div., Subj.: Triangle Plastics - info UT was a owner or partner of Essex Group till 4/88.
11	Telecomm. Record, Regal Plastics. Subj.: Current site status and operation - info

TDD FAX - 0587110644
TRIANGLE PLASTICS

SOURCES AND DATES OF INFORMATION COLLECTION

SOURCE	DATE
1) State Hazardous/Solid Waste Files	
2) State Water Files	
3) State Air Files	
4) State Department of Health	5-6/88
5) State Geological Survey	
6) State Department of Natural Resources	5/83
7) State Fire Marshall	
8) County Department of Health	
9) County Engineer	
10) County Clerk/Recorder of Deeds	
11) City Department of Health	5-9/88
12) City Engineer	
13) City Fire Department/Fire Marshall	
14) City Water/Sewer Department	
15) U.S. Soil Conservation Service	
16) Others See References	

STATE CONTACT(S): TIM JASKI (name) (313) 675-0860 (phone number)

(name) (phone number)

ecology and environment, inc.
111 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60604, TEL. 312-663-9415
International Specialists in the Environment

MEMORANDUM

DATE: NOVEMBER 30, 1989

TO: William Messenger, Chief Pre-Remedial Unit

FROM: Jerome D. Oskvarek, FIT Office Manager

SUBJECT: Transmittal Memorandum Identifying A Potential NFRAP Facility

CERCLIS Site Name: ESSEX GROUP INC - TRIANGLE PLASTICS

City: ROSEVILLE

State: MICHIGAN

U.S. EPA ID No.: MID042433458

SSID No.: —

TDD No.: F05-8711-064

PAN: FMI0243SA

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A work plan was tasked for the above-reference site; however, due to the HRS 1 preliminary and projected calculated scores, a work plan will not be prepared. The HRS worksheets are attached to this memorandum.

Exemption 5
Deliberative Process
1 page removed

COMMENTS

The FIT would like to make the following additional comments concerning the site.

1. WITH THE EXCEPTION OF A FEW PRIVATE WELLS (57 PEOPLE) (GREATER THAN 2 MILES DISTANCE), MUNICIPALITIES WITHIN A 4 MILE RADIUS OF THE SITE PURCHASE THEIR DRINKING WATER FROM DETROIT.
2. AN OVERLAND MIGRATION ROUTE FROM THE SITE TO THE NEAREST SURFACE WATER IS APPROXIMATELY 4 MILES AND PROBABLY DOES NOT EXIST DUE TO PAVED ROADS.
3. PROJECTED HRS SCORE FOR LSI IS HIGH DUE TO WORST POSSIBLE SCENARIO FOR POTENTIAL RELEASE WHICH IS NOT ADDRESSED AT THE SSI STAGE. FURTHERMORE, CONSIDERING THE HEAVY INDUSTRY IN THE SITE VICINITY,
4. A POTENTIAL AIR RELEASE WOULD BE DIFFICULT TO ATTRIBUTE TO THIS SITE ALONE.
5. _____

Exemption 5
Deliberative Process
2 pages removed

Exemption 5
Deliberative Process
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REFERENCE DOCUMENTATION SHEET

Ref. #	DESCRIPTION OF REFERENCE
1	Michigan Department of Public Health Water Well and Pump Records, Secs. 24, 25, 33, 36, T.2N., R.12E. and Secs. 19, 20, 21, 22, 24, 26, 27, 32, T.2N., R.13E.
2	U.S. Department of Commerce, C.R. Smith, Secretary, Climatic Atlas of the United States, 1968.
3	Bureau of Water Management and Water Resources Commission Memorandum to P. Zugger from T. Joshi, 4/10/75 with NPDES permit - short form C.
4	Miscellaneous documents from FIT file information.

REFERENCE DOCUMENTATION SHEET

Ref. #	DESCRIPTION OF REFERENCE
5	Michigan Department of Natural Resources - Water Management Division, Municipal Water Withdrawals in Michigan p. 5, 32.
6	U.S.G.S. Topographic Maps (1:24,000) Warren 1968 (p.r. 1983); Highland Park 1968 (p.r. 1983); Mt. Clemens 1968 (p.r. 1983); Grosse Point 1968 (p.r. 1983).
7	Mr. Solecki, Superintendent Warren City Water Department, telephone conversation with D. Lynch of E & E on 2/11/87.
8	A.C. Davanzo, Assistant Director Detroit Water Department, telephone conversation with D. Lynch of E & E on 2/9/87.

REFERENCE DOCUMENTATION SHEET

Ref.#	DESCRIPTION OF REFERENCE
9	Conversation with F Santella of E;E on 11/13/89 regarding possible compounds in plastics production
10	Telephone conversation with Tim Payne - MDNR Detroit Wildlife Division on 12/6/89. Contacted by S. Johnson of E;E.

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